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HONORABLE TIMOTHY DORE
CHAPTER 13

5 **IN THE UNITED STATE BANKRUPTCY COURT**
6 **WESTERN DISTRICT OF WASHINGTON**

7 IN RE:
8 MELISSA HUELSMAN

NO. 25-11036- TWD

9
10 DEBTOR.

EX PARTE MOTION TO
SHORTEN TIME ON DEBTOR'S
MOTION TO APPROVE ASSIGNMENT
OF REDEMPTION RIGHTS

12 **MOTION**

13 Comes now the Debtor by and through her attorney of record, Erin Lane, file this Motion
14 for the entry of an order shortening time with respect to the Debtor's Motion to Approve
15 Assignment of Redemption Rights.

16 **Background**

17 Contemporaneously with the filing of this Motion the Debtor filed a Motion to Approve
18 Assignment of Redemption Rights and proposed order and Declaration of Melissa Huelsman in
19 Support of the motion with exhibit. See Docket #38 and #39.

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21 Motion to Shorten Time 1-

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- 1 1. Foreclosure litigation was brought against Ms. Huelsman and a Default judgment was
2 entered against her on October 24, 2023 in the foreclosure litigation in Case Number 23-
3 2-00469-8 SEA.
- 4 2. The property was sold at judicial foreclosure on or about April 5, 2024, to Pomaikai, LLC
5 (“Pomaikai”).
- 6 3. At the time of filing Ms. Huelsman held redemption rights to the property. 11 USC
7 108(b) extended the redemption period to midnight on Monday July 14, 2025.
- 8 4. Early evening on Friday July 11, 2025, Ms. Huelsman entered into a purchase and sale
9 agreement for her to exercise her redemption rights. The offer is a cash offer with a
10 closing date of July 16, 2025.
- 11 5. The Redemption must occur on July 14, 2025. To do so Ms. Huelsman must assign her
12 redemption rights to the buyer and record it with the King County Records office on
13 Monday July 14, 2025.
- 14 6. Through this motion Ms. Huelsman is only seeking permission from this court to assign
15 her redemption rights to the buyer and to record the assignment with the King County
16 Records office.
- 17 7. We unfortunately, need an emergency hearing for July 14, 2025.

Jurisdiction

- 18 1. The Court has jurisdiction to consider this matter pursuant to 28 USC 1334. Venue is
19 proper pursuant to 28 USC 1408 and 1409. This matter is a core proceeding pursuant to
20 28 USC 157(b). The statutory predicate for the relief requested herein are rules 2002,
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9006(c) and 9007 of the Federal Rules of Bankruptcy Procedure and local rule 9013-1(d)(3).

Relief Requested

2. By this Motion, the Debtors seek entry of an order shortening the notice period with respect to Motion to Approve Sale of Real Property. The Debtor is asking the court that notice will be sent out as soon as the order is signed and a response deadline by Tuesday July 15, 2025 at 1:00 pm.

Basis for Relief

3. Bankruptcy Rules 9006(c) and 2002(a)(2) provide the Court may shorten “for cause” the 21 day notice period otherwise required by Bankruptcy Rule 2002(a)(1). Further pursuant to Bankruptcy Rule 9007, the Court has authority to determine appropriate notice for conducting a hearing on the matters presented by the Motion to Approve Assignment of Redemption Rights.
4. As required by Local Rule 9013-1(d)(3) the Debtors have advised the chapter 13 Trustee’s office.
5. The Debtor does not believe that due process is hindered as a result of the proposed shortening of this notice period for Debtor’s Motion. Ms. Huelsman is exercising her redemption rights put in place by the King County Superior Court and monies from the

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1 sale of the property are fully exempt by the homestead. Nor is any party in interest
2 unduly prejudiced by the shortened notice requested herein.

3 **Notice**

- 4 6. Upon entry of an order Notice of Debtor's Motion will be provided to (a) the US Trustee;
5 (b) Ch 13 Jason Wilson Aguilar (c) and (d) creditors on the matrix as the court directs.

6 **No Prior Request**

- 7 7. No prior motion for the relief requested herein has been made to this or any other court.

8 WHEREFORE, for the reason set forth herein, the Debtors respectfully request that the
9 Court (a) enter an order, substantially in the form attached hereto, granting the relief
10 requested herein and (b) grant such other and further relief as is just and proper.

11 Dated this July 14, 2025

Respectfully submitted,

12 /s/Erin Lane
13 Erin Lane, WSBA#42504
14 Attorney for Debtor
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